

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

<b>IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b>  <hr/> <b>THIS DOCUMENT RELATES TO: WAVE 4 CASES LISTED IN EXHIBIT A TO PLAINTIFFS' MOTION</b>	<b>Master File No. 2:12-MD-02327 MDL No. 2327</b>  <b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>
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**PLAINTIFFS' MOTION TO EXCLUDE CERTAIN OPINIONS AND TESTIMONY OF  
DEFENSE EXPERT SAMANTHA J. PULLIAM, M.D.**

NOW COME Plaintiffs, by and through undersigned counsel, and, pursuant to the Federal Rules of Evidence and *Daubert v. Merrill Dow Pharmaceuticals, Inc.*, 509 U.S. 579 (1993), and its progeny, respectfully file this Plaintiffs' Motion to Exclude Certain Opinions and Testimony of Defense Expert Samantha J. Pulliam, M.D., as contained in the TVT and TVT-O Expert Report of Samantha J. Pulliam, M.D. Specifically, Plaintiffs would respectfully show the Court that certain opinions and testimony should be excluded because: (1) they will not assist the jury in understanding the evidence; (2) they are not based upon sufficient facts, data or methodology; and, (3) the opinions are the product of unreliable principles and therefore cannot be reliably applied. Additionally, based on her education, background, training and experience, Dr. Pulliam is not qualified to render these opinions.

In support of this Motion, Plaintiffs incorporate by reference their contemporaneously filed Memorandum of Law in Support of Plaintiffs' Motion to Exclude Certain Opinions and Testimony of Samantha J. Pulliam, M.D. and the following exhibits:

1. Wave 4 Cases This Document Relates To, attached hereto as Ex. A.

2. TVT and TVT-O Expert Report of Samantha J. Pulliam, M.D., attached hereto as Ex. B.
3. Curriculum Vitae of Samantha J. Pulliam, M.D., attached hereto as Ex. C.
4. A true copy of the 3/31/2017 deposition transcript of Samantha J. Pulliam, M.D., attached hereto as Ex. D.
5. AA Ford et al., *Mid-urethral Sling Operations for Stress Urinary Incontinence in Women (Review)*, Cochrane Database of Systematic Reviews 2015, Issue 7, attached hereto as Ex. E.

WHEREFORE, FOR THESE REASONS and as more fully set forth in Plaintiffs' supporting memorandum of law, Plaintiffs respectfully request that this Court grant their Motion to Exclude Certain Opinions and Testimony of Defense Expert Samantha J. Pulliam, M.D. Additionally, Plaintiffs request all other and further relief to which they may be justly entitled.

This the 13<sup>th</sup> day of April, 2017.

WILSON LAW, P.A.

/s/ Kimberly Wilson White

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PLAINTIFFS' STEERING COMMITTEE

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 13, 2017, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive services in this MDL.

WILSON LAW, P.A.

/s/ Kimberly Wilson White

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PLAINTIFFS' STEERING COMMITTEE